

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDREA BREITHAUPT (1),
MICHELLE ZAT
(a/k/a “Shelley Zat”) (2),
CRYSTAL ZARATE-CRUZ
(a/k/a “Greenie”) (3),
ALICIA LOPEZ (4),
BRITTNEY MORGAN (6),
SUSAN WILKINS
(a/k/a “Danny”) (7),
ASHLEE M. MCELROY (9),
AUSTIN A. WUEST (10),
TERRI L. JACKSON (11),
STEVE EVANS (12),
KACIE L. KLUNDT (13),
KIMBERLIE S. KYLES (14),
KRISTIE M. BLOCH (15),
MARK A. PRESTON (16),
SHEENA ELLER (17),
PATRICK D. HUGHES (18), AND
WILLIAM H. CAMERON (20),

Defendants.

Case No.: 2:22-CR-00133-TOR-1-4,
6-7,
9-18,
and 20

PROTECTIVE ORDER
REGULATING DISCLOSURE OF
DISCOVERY AND SENSITIVE
INFORMATION CONTAINED
THEREIN

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2 The United States of America, having applied to this Court for a discovery
3 protective order regarding the disclosure of discovery and sensitive information
4 (the “Discovery”) to Defense Counsel in connection with the United States’
5 discovery obligations, and the Court finding good cause therefore, it is **HEREBY**
6 **ORDERED:**

7 1. The United States’ Unopposed Motion for Discovery Protective Order
8 is **GRANTED**.

9 2. The United States is authorized to disclose Discovery in its possession
10 and personal information material (hereinafter “Discovery”) in its possession
11 pursuant to the discovery obligations imposed by this Court.

12 3. Government personnel and counsel for Defendant shall not provide, or
13 make available, the Discovery to any person except as specified in this Order or by
14 approval from this Court. Therefore, defense counsel and the Government shall
15 restrict access to the Discovery, and shall only disclose the Discovery to their
16 client, office staff, investigators, independent paralegals, necessary third-party
17 vendors, consultants, and/or anticipated fact or expert witnesses to the extent that
18 defense counsel believes is necessary to assist in the defense of their client in this
19 matter or that the Government believes is necessary in the investigation and
20 prosecution of this matter.

21 4. Third parties contracted by the United States or defense counsel to
22 provide expert analysis or testimony may possess and inspect the Discovery, but
23 only as necessary to perform their case-related duties or responsibilities in this
24 matter. At all times, third parties shall be subject to the terms of this Order.

25 5. Discovery in this matter will be made available to defense counsel via
26 access to a case file on USA File Exchange, a government-provided USB-drive (to
27 be returned to the government after downloading) and defense-provided external
28 hard drives due to the volume of material. If necessary, to review discovery with

1 the client, defense counsel may download the Discovery and duplicate only once.
2 Discovery materials may not be left in the possession of the Defendant. In order to
3 provide Discovery to a necessary third-party vendor, consultant, and/or anticipated
4 fact or expert witness, defense counsel may duplicate the Discovery only once. No
5 other copies shall be made, by defense counsel, the Defendant or the third-party,
6 without prior approval from this Court.

7 6. To the extent that defense counsel makes any portion of the Discovery
8 available in paper format to anyone, including his client, outside of counsel's
9 office, defense counsel shall ensure that any and all sensitive and confidential
10 information is redacted or removed.

11 7. All counsel of record in this matter, including counsel for the United
12 States, shall ensure that any party, including the Defendant, that obtains access to
13 the Discovery is provided a copy of this Order. No other party that obtains access
14 to or possession of the Discovery shall retain such access or possession unless
15 authorized by this Order, nor further disseminate the Discovery except as
16 authorized by this Order. Any other party that obtains access to, or possession of,
17 the Discovery shall promptly destroy or return the Discovery once access to or
18 possession of Discovery is no longer necessary. For purposes of this Order, "other
19 party" is any person other than counsel for the United States, counsel for
20 Defendant, or the Defendant.

21 8. All counsel of record, including counsel for the United States, shall keep
22 a list to identify each person to whom the Discovery is disclosed and who was
23 advised of the requirements of this Order. Neither counsel for the Defendant, nor
24 the counsel for the United States, shall be required to disclose this list of persons
25 unless ordered to do so by the Court.

26 9. Upon entry of a final order of the Court in this matter and conclusion of
27 any direct appeals, government personnel and counsel for Defendant shall retrieve
28 and destroy all copies of the Discovery, except that counsel and government

1 personnel may maintain copies in their closed files following their customary
2 procedures.

3 10. Government personnel and counsel for Defendant shall promptly report
4 to the Court any known violations of this Order.

5 **IT IS SO ORDERED.** The District Court Executive is hereby directed to
6 enter this order and furnish copies to counsel.

7 DATED October 14, 2022.



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A handwritten signature in blue ink that reads "Thomas O. Rice". The signature is written over a horizontal line.

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Thomas O. Rice
United States District Judge